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Attorney for Petitioner United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES,

Plaintiff,

v.

BABAK BROUMAND AND
MALAMATENIA MAVROMATIS,

Defendants.

Case No. CR-21-00162-WHO

**STIPULATION TO CONTINUE
STATUS CONFERENCE FROM JULY
11, 2024 AT 1:30 P.M., TO OCTOBER
31, 2024 at 1:30 P.M. AND EXCLUDE
TIME UNDER THE SPEEDY TRIAL
ACT; AND ORDER**

STIPULATION

The parties hereby stipulate that the currently set status conference be continued from
July 11, 2024, at 1:30 p.m. to October 31, 2024, at 1:30 p.m.

1 1. Defendant BABAK BROUMAND is in custody in the Central District of
2 California after being convicted at jury trial in the related case of *United States v. Broumand*,
3 20-224-RGK(A).

4 2. The government has produced over 60,000 pages of discovery to defendant
5 MAVROMATIS, which primarily consists of business records, including bank, credit card,
6 mortgage broker, title company, and escrow company records, tax returns, and witness
7 interview reports.
8

9 3. On March 24, 2022, the government obtained a superseding indictment in this
10 case adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in
11 which she was charged with two counts of False Statements on a Loan Application in
12 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's
13 indictment, co-defendant BABAK BROUMAND had already been charged.
14

15 4. Counsel for both defendants agree that additional time is needed for meaningful
16 preparation for trial, including additional research and investigation, and discussions with
17 their clients and the government regarding possible pretrial resolution. The parties are
18 currently engaged in earnest pretrial resolution discussion that may obviate the need for trial.
19 The government extended a proposed global disposition on October 19, 2023. The proposed
20 global disposition related to tax charges and required defense counsel to consult with outside
21 subject matter experts to effectively advise their clients. As a result, the parties met and
22 conferred. On January 29, 2024, the government again extended a proposed global
23 disposition, taking into account issues raised by counsel during negotiation. Since then, the
24 parties have been in constant communication to discuss and address the issues raised by
25 counsel. Counsel for Mr. Broumand represents that he has had discussions with Mr.
26
27
28

1 Broumand regarding the government's proposed disposition, but needs additional time to
2 discuss the plea with Mr. Broumand due to ongoing negotiations with the government and
3 scheduling difficulties related to Mr. Broumand's incarceration. Thus, both defendants agree
4 more time is needed to review, and advise their clients on the government's proposed global
5 disposition in this matter, and prepare for a potential jury trial should negotiations fail.
6

7 5. The government and counsel for the defendants agree that time be excluded under
8 the Speedy Trial Act so that defense counsels can continue to prepare for trial and engage in
9 pretrial resolution discussions.
10

11 6. The parties stipulate and agree that excluding time until October 31, 2024, will allow
12 for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further
13 stipulate and agree that the ends of justice served by excluding the time from July 11, 2024,
14 through October 31, 2024 computation under the Speedy Trial Act outweigh the best interests
15 of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).
16

17 7. The parties are also discussing resolution of this entire matter and require more time
18 to discuss different settlement alternatives. The parties believe that they are close to reaching
19 a pretrial resolution and in the event they do so will seek to stipulate to advance the status
20 conference to a date and time convenient for all parties and the Court.
21

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23 //

8. The undersigned Assistant United States Attorneys certify that they have obtained approval from all counsel to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: July 8, 2024

/s/ Juan M. Rodriguez
MICHAEL J. MORSE
JUAN M. RODRIGUEZ
Special Assistant United States Attorney

DATED: July 8, 2024

/s/ Steven F. Gruel
STEVEN F. GRUEL
Counsel for Defendant BROUMAND

DATED: July 8, 2024

/s/ Paul H. Nathan
PAUL H. NATHAN
Counsel for Defendant MAVROMATIS

ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court hereby continues the status conference from July 11, 2024, at 1:30 p.m. to October 31, 2024, at 1:30 p.m.

Furthermore, the Court finds that failing to exclude the time from July 11, 2024, through October 31, 2024, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).


The Court further finds that the ends of justice served by excluding the time from

1 July 11, 2024, through October 31, 2024, from computation under the Speedy Trial Act
2 outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and
3 with the consent of the parties,
4

5 IT IS HEREBY ORDERED that the time from July 11, 2024, to October 31, 2024,
6 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A),
7 (B)(iv).
8

9 IT IS SO ORDERED.
10

11
12 DATED: July 11, 2024



HONORABLE WILLIAM H. ORRICK
United States District Court